

KELLOGG, HANSEN, TODD, FIGEL & FREDERIC

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June 23, 2021

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of May 25, 2021, ECF No. 6819, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's order of November 24, 2020, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

On June 14, 2021, Saudi Arabia circulated to the parties proposed redactions for the sealed filings leading up to the Court's May 27 and June 23, 2020 orders. Counsel are continuing to work on proposed redactions for the sealed filings leading up to the July 20, August 11, and October 2, 2020 orders.

As set forth in the parties' April 23, 2021 letter, ECF No. 6761, Plaintiffs have completed their review of the sealed filings leading up to the Court's January 7, April 27, May 7, May 27, August 11, August 27, and October 2, 2020 orders for information subject to the FBI protective order and have circulated proposed redactions to Saudi Arabia and to the FBI.

FBI expects to circulate to the parties, by the end of this week, proposed additional redactions to the filings associated with Plaintiffs' August 5, 2019 motion for reconsideration, Plaintiffs' August 5, 2019 motion to vacate, and Plaintiffs' September 9, 2019 letter.

On June 17, 2021, the King Fahad Mosque, Khalil Al Khalil, and Osman Kaldirim indicated that they did not wish to participate in meet-and-confer discussions concerning continued sealing or redaction of any portions of the deposition transcripts that were submitted leading up to the July 22, 2019 orders. Accordingly, the only step remaining before proposed redactions for those filings can be submitted to the Court is for the parties to meet and confer to

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attempt to resolve any remaining disputes. The parties have scheduled a meet-and-confer session for July 12, 2021.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before July 23, 2021.

Respectfully submitted,

/s/ Michael K. Kellogg


Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)

The Parties' motion is GRANTED. The Parties shall submit a further joint status letter on July 23, 2021.

**SO ORDERED.**

Dated: June 24, 2021  
New York, New York

  
SARAH NETBURN  
United States Magistrate Judge